

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 08-37-JJF
	:	
IRA BLAND,	:	
	:	
Defendant.	:	

**MOTION FOR AUTHORIZATION TO INCUR EXPENSES  
FOR INVESTIGATIVE SERVICES**

Christopher S. Koyste, on behalf of Ira Bland, hereby moves the Court for authorization to incur expenses for investigative services on behalf of Defendant in the above captioned matter. In support of this motion, it is further represented as follows:

1. Defendant has been indicted for felony possession of a firearm in and affecting interstate commerce. Defendant has been determined to be indigent and eligible for Court appointed representation.
2. The undersigned has determined in his professional judgment that the services of an investigator are needed in this case to investigate any potential suppression issues and to prepare for hearings in this action. Counsel has already had discussions with private investigator Tom Monahan<sup>1</sup>

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<sup>1</sup> Tom Monahan of Monahan, Monahan & Golt Investigations is a retired Wilmington Police Officer and currently is the Director of Public Safety for Winterthur and is licensed by the State of Delaware to be a private investigator. His business address is 8 East 13 Street, Wilmington, Delaware 19801.

in relation to this case. Defendant requests approval to retain Mr. Monahan to provide investigative services in this case at a rate of \$60.00 an hour and a total cost that will not exceed \$1,200.00.

WHEREFORE, Defendant requests that the Court approve the expenditure of up to \$1,200.00 for investigative services to be paid by the District Court for the District of Delaware.

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Christopher S. Koyste (# 3107)  
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302-762-5195  
Attorney for Defendant Bland

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**ORDER**

Having considered Defendant's Motion for Authorization to Incur Expenses for Investigative Services, **IT IS HEREBY ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2008, that Defendant's Motion is **GRANTED** and that the Firm of Monahan, Monahan and Golt is authorized to provide investigative services at the rate of \$60.00 an hour, up to a total of \$1,200.00 in this case.

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Judge Joseph J. Farnan, Jr.

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**CERTIFICATE OF SERVICE**

Undersigned Counsel certifies that the attached filing of Ira Bland is available for public viewing and downloading and was electronically delivered on June 2, 2008 to:

Shawn Martyniak, Esquire  
Assistant United States Attorney  
United States Attorney's Office  
1007 Orange Street, Suite 700  
Wilmington, Delaware 19801

/s/ Christopher S. Koyste  
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